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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA  
DIVISION ONE**

Casitas Del Sol Condominium Owners Association, an Arizona corporation;

**Case No.**

Plaintiff,  
v.  
State Farm Fire and Casualty Company, an  
Illinois Corporation; John and Jane Does, I-X;  
XYZ Partnerships, I-X; ABC Corporations, I-X.

**STATE FARM FIRE AND CASUALTY  
COMPANY'S NOTICE OF REMOVAL  
OF ACTION**

Please take notice that Defendant State Farm Fire and Casualty Company ("State Farm") hereby removes to this Court the state court action described below:

1. Petitioner is a defendant in a civil action commenced and now pending in the Superior Court in Maricopa County, Arizona, entitled *Casitas Del Sol Condominium Owners Association vs. State Farm Fire and Casualty Company, a foreign corporation*.

1 Case No. CV2022-004452. A copy of the Complaint in this action is attached hereto as  
2 Exhibit "A" and incorporated herein by this reference.

3       2. Within 30 days of this Notice of Removal of Action, Defendant received a  
4 copy of the Summons and Complaint served upon it through the State of Arizona  
5 Department of Insurance.

6       3. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).

7       4. Defendant State Farm is a corporation incorporated in the State of Illinois  
8 with its principal place of business in the State of Illinois.

9       5. Plaintiffs are individuals.

10      6. Jurisdiction is proper pursuant to 28 U.S.C. § 1332 in that diversity of  
11 citizenship exists for the purposes of establishing federal jurisdiction.

12      7. Plaintiffs assert claims for insurance bad faith and breach of contract, and  
13 pray for an award of punitive damages.

14      8. Defendant certifies that notice of this Removal has been filed with the Clerk  
15 of the Superior Court of the State of Arizona, Maricopa County, as provided in 28 U.S.C.  
16 § 1446(d).

17      9. True copies of all process, pleadings and orders which have been served or  
18 filed in this case are attached hereto and filed herewith.

19      10. The undersigned has read this Notice of Removal and, to the best of the  
20 undersigned's knowledge, information and belief, formed after reasonable inquiry, certifies  
21 that Defendant's factual allegations have evidentiary support and its legal contentions are  
22 warranted by existing law. The undersigned also certifies that this Notice of Removal is  
23 not presented for any improper purpose, such as to harass or cause unnecessary delay or  
24 needless increase in the cost of litigation.

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1 RESPECTFULLY SUBMITTED this 25<sup>th</sup> day of April, 2022.

2 BROENING OBERG WOODS & WILSON, P.C.

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By /s/Jessica T. Kokal

Robert T. Sullivan

Jessica J. Kokal

Attorneys for Defendant

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7 CERTIFICATE OF SERVICE

8 I hereby certify that on April 25, 2022, I electronically transmitted the attached  
9 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a  
10 Notice of Electronic Filing to the following CM/ECF registrants:

11

12 A courtesy copy with a copy of the Notice of Electronic filing was also  
13 emailed/mailed on this same date at the following address:

14

15 Douglas F. Dieker  
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By /s/Amy Ebanks

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